

**IN THE UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MISSOURI
NORTHERN DIVISION**

KRISTIN MARIE SMITH
and LLOYD SMITH,

Plaintiffs,

v.

Cause No. 2:16-cv-24- ERW

TOYOTA MOTOR CORPORATION,
TOYOTA MOTOR SALES, U.S.A., INC.

Defendants.

DEFENDANTS' OBJECTIONS TO PLAINTIFFS' EXHIBIT LIST

Defendants Toyota Motor Corporation and Toyota Motor Sales, U.S.A., Inc. (Toyota Defendants) file these objections to Plaintiffs' Exhibit List (Doc. 94) and would respectfully show the Court as follows:

First, Plaintiffs' exhibit list contains numerous entries listed as exhibits to depositions taken in previous, unrelated cases from the instant lawsuit—including Christopher Tinto (*Hunsberger v. Toyota Motor Corp.* (2005)), Takashi Yonekawa (*Hunsberger*), Motoki Shibata (*Hunsberger and Hem v. Toyota Motor Corp.* (2008)), and Takashi Shirasu (*Hem*). None of these exhibits should be admissible in the instant case. Plaintiffs failed to formally disclose or produce any of these materials to the Toyota Defendants in this case at any point. At best, the materials were included in a subfolder to a subfolder to a subfolder of a flash drive of Plaintiff expert Mark Arndt's file materials, produced at his deposition on December 13, 2017—and were still never identified as anything other than expert reliance materials. Accordingly, under Federal Rules of Civil Procedure 26(a) and 37(c)(1), Plaintiffs should not be allowed to use any of these undisclosed exhibits at the trial of this matter.

Moreover, Plaintiffs are unable adequately to establish that these exhibits are what they are purported to be, as required by Federal Rule of Evidence 901. Other than some limited

deposition testimony designations for Christopher Tinto from *Hunsberger*, Plaintiffs simply do not have any testimony from these deponents in those prior cases at all—much less authenticating any of the listed exhibits. And, even as to Christopher Tinto, as more fully described in the Toyota Defendants’ objections to Plaintiffs’ deposition designations, Mr. Tinto’s testimony should be entirely excluded and thus be unable to serve as any authentication.

Plaintiffs cannot be allowed to suddenly inject 65 new exhibits into this lawsuit, some of which are very voluminous, many of which are quite irrelevant—including for instance subject vehicle photographs from those other cases—and all of which have never been formally produced in this case. Plaintiffs first served federal initial disclosures in this case in August 2016 and from then until now Plaintiffs have been under the continuing obligation of Federal Rule of Civil Procedure 26(a) to provide to the Toyota Defendants a copy or a description by category and location of all documents and electronically stored information in their possession, custody, or control “that the disclosing party may use to support its claims” Plaintiffs wholly failed to do so with respect to these exhibits from 10 and 13-year old depositions. And, under Rule 37(c)(1), none of these exhibits should be admissible in the instant case.

In addition to the global objections to all of Plaintiffs’ exhibits listed as prior case deposition exhibits, the Toyota Defendants further object to Plaintiffs’ exhibit list as follows:

EXH.:		OBJECTIONS, IF ANY:
	EXHIBITS TO DEPO OF CHRISTOPHER TINTO (HUNSBERGER v. TOYOTA; 03.16.05)	<i>See global objections to exhibits from prior case depositions</i>
P1	Mr. Tinto's handwritten organizational chart	Fed. R. Evid. 401, 402, 403, 801, 802, 901
P2	Mr. Tinto's statement before Congress	401, 402, 403, 801, 802, 901
P3	Toyota Engineering Standards Test Method for Vehicle Rollovers	1002 (<i>See</i> TMC Initial Disclosure Bates 2339 – 2354)
P4	Transcript of Toyota presentation to NHTSA MVRAC Rollover Subcommittee	401, 402, 403, 801, 802, 901
P5	Toyota 4Runner 4x2 Photos and Measurements	401, 402, 403, 801, 802, 901; injects other incidents
P6	Toyota 4Runner 4x4 Photos and Measurements	401, 402, 403, 801, 802, 901, injects

		other incidents
P7	SAE, "Active Control Strategy for Improved Handling and Stability	901, 1002 (See TMC Initial Disclosure Bates 120767-120777)
P8	Test Report in Japanese and English	401, 402, 403, 901
P9	Test Report in Japanese and English	401, 402, 403, 901
P10	Article, "Stability Criteria and Evaluation of Steering Maneuver in 'Driver Vehicle System'"	901, 1002 (See TMC Initial Disclosure Bates 120750-120757)
P11	Article, "Vehicle Dynamics and Control for Active Safety"	901, 1002 (See TMC Initial Disclosure Bates 380732-380741)
P12	Rapid Test Report	401, 402, 403; other vehicles not relevant
P13	Article, "Driver's Characteristics of Avoidance Maneuver"	901, 1002 (See TMC Initial Disclosure Bates 107139-107144)
P14	Article, "A Study of Rollover of Sport Utility Vehicle"	901, 1002 (See TMC Initial Disclosure Bates 99162-99167)
P15	Article, "A Study on Rollover of Sport Utility Vehicle"	901, 1002 (See TMC Initial Disclosure Bates 47272-47276)
P16	Japanese Document Titled "A Study of Rollover of Sport Utility Vehicle"	901, 1002 (See TMC Initial Disclosure Bates 47268-47271)
P17	Article, "A Study of Emergency Maneuverability"	901, 1002 (See TMC Initial Disclosure Bates 121140-121145A)
P18	Engineering Report No. T9512-0877	901, 1002 (See TMC Initial Disclosure Bates 54438-54482)
P19	Marketing Technical Information Booklet for the 1996 Toyota 4Runner	403
P20	Internal Memo to the NHTSA Docket from Mr. Pyne	403
P21	Ford Motor Company Memorandum	401, 402, 403, 801, 802, 901
P22	Engineering Report No. T9712-1178	901, 1002 (See TMC Initial Disclosure Bates 98014-98055)
P23	Article in Japanese Titled "Average Driver's Behavior in Emergency Situation and Limit of Tire Adhesion"	901, 1002 (See TMC Initial Disclosure Bates 238437)
P24	Engineering Report No. T9804-1186	901, 1002 (See TMC Initial Disclosure

		Bates 121016-121027)
P25	Engineering Report No. T9809-0401	401, 402, 403; other vehicles not relevant
P26	Engineering Report No. T9812-0209	401, 402, 403; other vehicles not relevant
P27	Engineering Report No. T9812-0093	901, 1002 (See TMC Initial Disclosure Bates 125584-125598)
P28	NHTSA Table of 1998 SUVs	801, 802, 901
P29	LF Mr. Yoshie to Ms. Bailey, 8/30/00	401, 402, 403, 801, 802, 901
P30	Toyota Hot Sheet, November 2000	401, 402, 403, 801, 802, 901
P31	LF Mr. Tinto to Mr. Weinstein, 1/18/02	401, 402, 403, 801, 802, 901
P32	LF Mr. Matsunami to Mr. Sugiyama, 1/18/02	401, 402, 403, 801, 802, 901
P33	Toyota Interoffice Memo, 1/18/02	401, 402, 403, 801, 802, 901
P34	Toyota Engineering Standard TSA5130G	901, 1002 (See TMC Initial Disclosure Bates 149455)
P35	Toyota Engineering Standard TSA1526G	901, 1002 (See TMC Initial Disclosure Bates 160252)
P36	Test Result Report for '97 4Runner	901, 1002 (See TMC Initial Disclosure Bates 202227)
P37	Engineering Report No. T0211-0840	901, 1002 (See TMC Initial Disclosure Bates 163520-163547)
P38	Engineering Report No. T0211-0841	901, 1002 (See TMC Initial Disclosure Bates 163585-163621)
P39	LF Mr. Cammisa to Dr. Runge, 11/21/02	401, 402, 403, 801, 802, 901
P40	Engineering Report No. T0211-0840	901, 1002 (See TMC Initial Disclosure Bates 163520-163547)
P41	Acknowledgement Fax Sheet of Receipt of Defect Information Report Submitted Under 40 CFR Part 573	401, 402, 403, 801, 802, 901
P42	LF Mr. Tinto to Mr. Weinstein, 1/18/02	401, 402, 403, 801, 802, 901
P43	Toyota Customer Services Interoffice Memo from Mr. Zellers	401, 402, 403, 901

P44	E-mail from Toyota Motor Sales to the Dealers' Service Managers	401, 402, 403, 901
P45	Quarterly Report on Notification of Campaign - Part 573.6(b)	401, 402, 403, 801, 802, 901
P46	LF Mr. Tinto re: Docket 2001-9663	401, 402, 403, 801, 802, 901
P47	Article, "Development of Estimation Method of Vehicle's Emergency Handling"	901, 1002 (See TMC Initial Disclosure Bates 175156-175161)
	EXHIBITS TO DEPO OF TAKASHI YONEKAWA (HUNSBERGER v. TOYOTA; 01.20-21.05)	<i>See global objections to exhibits from prior case depositions</i>
P48	Copy of Yonekawa's resume	401, 402, 403
P49	Collection of 4 documents re: the recall of the '96 - '98 model 4Runner for handling performance defect 1. Defect Information Report for 4Runner Handling Performance dated 1/21/2002 (1 page) 2. Interoffice Memo from Zellers to Distributor/VP's re: 1996-1998 MY 4Runner Rear Suspension Modification (4 pages) 3. LF Tinto to Weinstein/NHTSA re: Toyota 4Runner Handling Performance, Part 573, Defect Information Report (4 pages) 4. MF Toyota Customer Service to All Toyota Dealers re: 1996-1998 MY4Runner Rear Suspension Modification SSC (2 pages)	401, 402, 403, 801, 802, 901
P50	Engineering Report TO206-1269 dated 6/26/02	401, 402, 403, 801, 802, 901
P51	TO 206-1270 6/26/02	401, 402, 403, 801, 802, 901
P52	Test TO 206-1271 6/26/02	401, 402, 403, 801, 802, 901
P53	100 Foot SAE J266 Circle Test	401, 402, 403, 801, 802, 901
P54	Article from Experimental Safety Vehicle Conference, "Development of Estimation Method..."	401, 402, 403, 801, 802, 901
P55	Transcript of presentation by Toyota to NHTSA Rollover MVSRAAC Rollover Subcommittee 3/16/89	401, 402, 403, 801, 802, 901
	EXHIBITS TO DEPO OF MOTOKI SHIBATA (HUNSBERGER v. TOYOTA; 01.21.05)	<i>See global objections to exhibits from prior case depositions</i>
P56	CV	403; more current CV available at P234
	EXHIBITS TO DEPO OF MOTOKI SHIBATA (HEM v. TOYOTA; 06.05.08)	<i>See global objections to exhibits from prior case depositions</i>
P57	Background of Mr. Motoki Shibata (1 pg)	403; more current CV available at

		P234
P58	Resume in Japanese (1 pg)	403; more current CV available at P234
P59	Materials reviewed by the deponent: Engineering Reports and Test Standards	403, 1002; illegible copies—relevant reports and standards were produced in this case
P60	Copy of Color Photograph	401, 402, 403, 901; injects other incidents
P61	Copy of Color Photograph	401, 402, 403, 901; injects other incidents
P62	Copy of Color Photograph	401, 402, 403, 901; injects other incidents
	EXHIBITS TO DEPO OF TAKASHI SHIRASU (HEM v. TOYOTA; 06.05.08)	<i>See global objections to exhibits from prior case depositions</i>
P63	Background of Mr. Takashi Shirasu (1 pg)	401, 402, 403, 801, 802, 901
P64	Resume in Japanese (1 pg)	401, 402, 403, 801, 802, 901
P65	Materials reviewed by the deponent: Engineering Report No T9904-1223: Results of Stability and Controllability Evaluation of 800 T Off Road Package (40 pg) Engineering Report No. T9904-1519: Evaluation of RO Resistance Performance on 800T (45 pg) Engineering Report No. T9904-1224: Results of Stability and Controllability Evaluation of 800 T (16 pg) Toyota Engineering Standard TS A1544: Method for Measuring Lateral Acceleration for RO (9 pg) Toyota Engineering Standard TS A1501G: Prep Procedure for Vehicle Controllability and Stability Test (9 pg) Toyota Engineering Standard TS A1513G.1: Straight Line Stability Test Method at High Speed (10 pg) Toyota Engineering Standard TS A1515G.4: Slalom Test Method (13 pg) Toyota Engineering Standard TS A1516g.4: Fixed Control Test Method (10 pg) Toyota Engineering Standards TS A1517G.1: Free Control Test Method (7 pg) Toyota Engineering Standards TS A1526G.1: Maximum Lateral Acceleration Test Method (6 pg) Toyota Engineering Standards TS A1527G.1: Pylon Slalom Test Method (6 pg) Toyota Engineering Standards TS A0509G.2: Measurement Method of Moment of Inertia About 3 Axis of Vehicle and Height of Gravitational Center (13 pg) Toyota Engineering Standards TS A0508G: Measurement Method of Moment	403, 1002; less legible copies—relevant reports and standards were produced in this case

	of Inertia About 3 Axes of Vehicle and Height of Gravitational Center (10 pg) Toyota Engineering Standards TS Z5100G: Terms on Controllability and Stability (55 pg) Remaining documents are in Japanese	
	CASE DEPOS:	
	EXHIBITS TO THE DEPO OF AUSTIN, KILE (SMITH v. TOYOTA; 2015 11 17)	
P66	Affidavit of Kile Austin	403, 801, 802
P67	Photograph	
	EXHIBITS TO THE DEPO OF ARNDT, MARK (SMITH v. TOYOTA; 2017 12 13)	
P68	USB containing entire file: correspondence, depositions, documents/reports/articles, medical records, MWA work, vehicle photos by Lloyd Smith, early site photos by Lloyd Smith, MWA site inspection and measurement photos, MWA drive through video, testing material from Mickey Gilbert, accident report, vehicle photos, Western Lewis County FD records, Complaint, First Amended Petition	Unable to correlate specific objections with exhibits due to bulk identification; Defendants reserve right to object to any specific materials contained herein—including specifically any reference to other incidents and testing of Toyota 4Runner vehicles not conducted by Mr. Arndt
P69	Plaintiffs' Initial Expert Disclosure	401, 402, 403, 801, 802,
	EXHIBITS TO THE DEPO OF CARHART, MICHAEL (SMITH v. TOYOTA; 2018 01 05)	

P70	Flash Drive containing: Literature, Crash Report, Western Lewis FD Report, Case Depos, Defendant's Preliminary RO Sequence, Plaintiffs' Expert Disclosure, Karen Grossman Tabak Report/CV, Defendant's Discovery Responses, Plaintiffs Discovery Responses and NOD, Medical Records, Photos: Lee Carr, Scene, Injury, Vehicle; Vehicle CARFAX	Unable to correlate specific objections with exhibits due to bulk identification; Defendants reserve right to object to any specific materials contained herein
	EXHIBITS TO THE DEPO OF CARR, LEE (SMITH v. TOYOTA; 2018 01 05)	
P71	Carr Engineering Inc, Exhibit List, 1/4/2018	
P72	Three-ring binder (red in color): case specific material	Unable to correlate specific objections with exhibits due to bulk identification; Defendants reserve right to object to any specific materials contained herein
P73	Three-ring binder (white in color): case specific material	Unable to correlate specific objections with exhibits due to bulk identification; Defendants reserve right to object to any specific materials contained herein
P74	Hard Drive: Exhibits Literature Mail Materials Reviewed Testing Smith, Kristin v. Toyota - Carhart file	Unable to correlate specific objections with exhibits due to bulk identification; Defendants reserve right to object to any specific materials contained herein
P75	Copies of depo transcripts reviewed	403, 801, 802
P76	Manila folder: Arndt Reconstruction, Arndt Explorer	
P77	Manila folder: Carr invoices, pleadings, emails, correspondence	
P78	Reproduced copy of original data published in Item 40, Exh. 4: Charts, graphs, handwritten notes, vehicle CG data sheet, tire size notes, vehicle information notes, VIN decoded, 1997 Manufacturer Motor Vehicle Spec (TMC), articles/publications, pleadings,	
	EXHIBITS TO THE DEPO OF KLIMA, MICHAEL (SMITH v. TOYOTA; 2018 01 03)	
P79	CV	
P80	List of Testimony	
P81	Billing	

P82	Hard drive: Depositions, Discovery, Docs produced by TMC and TMS, Investigation (Crash Report, CARFAX); Lee Carr Photos, scene photos, vehicle photos produced by Plaintiff	Unable to correlate specific objections with exhibits due to bulk identification; Defendants reserve right to object to any specific materials contained herein
P83	Correspondence	403, 801, 802
P84	Other legal docs: NOD, Plaintiffs Initial Expert Disclosure, TMC and TMS, USA Expert Disclosure, Order Granting Parties Joint Motion to Amend Case Management Order, Amended Case Management Order, Complaint	401, 402, 403, 801, 802
P85	Accident report (redacted in accordance with MIL ruling)	
P86	Vehicle documentation: CARFAX	
P87	Depo summaries	403, 801, 802
P88	SAE transactions, paper preamble	
P89	SAE paper, 2005-01-1702	
P90	DRE report 111PT, seatbelt retractor	
P91	Hard drive: Correspondence, Legal documents, Accident Report and Scene Photographs, Accident Vehicle and Site Photographs, Medical Records, Vehicle Documentation, Plaintiffs Expert Documents, Defense Expert Documents, Depositions, DRE Documentation	Unable to correlate specific objections with exhibits due to bulk identification; Defendants reserve right to object to any specific materials contained herein
P92	Renfroe paper	
	EXHIBITS TO THE DEPO OF OYAMA, KOZO (SMITH v. TOYOTA; 2017 09 29)	
P93	Background of Mr. Kozo Oyama	
P94	Background of Mr. Kozo Oyama (Japanese version)	
P95	Manufacturers Motor Vehicle Specs 1996 - 4Runner	
P96	Handwritten Information - 2nd Gen & 3rd Gen	
P97	SSF	801, 802, 901
P98	Transcript of Toyota Presentation to NHTSA MVSAC RO Committee - March 16, 1983	401, 402, 403, 801, 802, 901
P99	SSF Chart	801, 802, 901
P100	Video Clip (Retained by Counsel)	401, 402, 403
P101	Video Clip (Retained by Counsel)	401, 402, 403, 901
P102	Article: "Driver's Characteristics of Avoidance Maneuver"	901, 1002 (See TMC Initial Disclosure Bates 107139-107144)
P103	Drawings 96-02 (Just 1997)	
P104	Test Results	

P105	Standards/Test Procedures for Third Gen 4Runner - Handling and Stability and RO Resistance Evaluation	
P106	1990-1995 Model Tests - Second Gen	401, 402, 403
P107	4Runner New Car Features - 1996	
	EXHIBITS TO THE DEPO OF KUMAR, SRI (SMITH v. TOYOTA; 2017 12 19)	
P108	Plaintiffs' Initial Expert Disclosure	401, 402, 403, 801, 802
P109	Correspondence materials	401, 402, 403, 801, 802
P110	Invoices	401, 402, 403, 801, 802
P111	CV	801, 802
P112	Testimony List	
P113	Accident Report Manila Folder (redacted in accordance with MIL ruling)	
P114	Recon Manila Folder: Aerial Photo w/rollover trajectory overlay, graphs, photos showing scratch marks, scratch pattern analysis	
P115	Notes Manila Folder	801, 802
P116	Depo Summary Manila folder	403, 801, 802, 1002
P117	Vehicle photos Manila Folder	
P118	9/30/2015 Exemplar Study Photographs	
P119	11/2/2017 Exemplar Study Photographs	
P120	Group of six discs: 1. Study 1-5 X-ray ankle, chest, abdomen 2. Medical records/bills 3. Medical records/bills 4. Blessing Hospital records 5. Case File Material 6. Untitled	Unable to correlate specific objections with exhibits due to bulk identification; Defendants reserve right to object to any specific materials contained herein
P121	Electronic Copy of Exemplar Studies	
P122	Group of Scientific Articles: Impact Biomechanics of the Human Thorax - Abdomen Complex Marks Standard Handbook for Mechanical Engineers Motor Vehicle Seat Belt Restraint System Analysis During RO Human Tolerance to Impact Conditions as Related to Motor Vehicle Design - SAE J885 Injury Calculations Guidelines Preliminary Findings from the National Crash Severity Study Experimental and Computational Investigation of Human Clavicle Response in Anterior-Posterior Bending Loading	401, 402, 403
P123	Summary of Medical Records and Medical Records	801, 802, 1002
P124	Medical Summary and Illustrations	801, 802, 1002
	EXHIBITS TO THE DEPO OF MEYER, STEVEN (SMITH v. TOYOTA; 2017 12 18)	

P125	Flash Drive containing: 1. Meyer Exhibits (Vehicle photos, scene photos, complaint, scheduling order, crash report, Lewis County Sheriffs report, Depos, Medical Records, Vehicle Data, Testimony re: Belt Use, Exemplar seat belt, jury teaching, exemplar retractors with CLP, SAE 840396, TRW - Chamberlain docs, Autoliv Full Service Supplier, Ejection Mitigation Timeline, Restraint Performance Papers, Previous SAFE testing, Quote from Obergefell paper/presentation, SAFE roll spit with CLP, SAFE high speed roll spit tests, testing: relieved retractor tension, Dolly RO Tests w/Spool Out, CLP Patents, Retractor Patents, Occupant Protection Timeline, FMVSS 209, GM LT NHTSA re: Inconsequential Noncompliance, 1997 Chevy Blazer recall docs, Evenflo Dolly RO video, Castillo v. GM dolly RO) 2. Meyer File Contents List 3. Scanned Depo Notebook 4. Scanned Photo Binder	Unable to correlate specific objections with exhibits due to bulk identification; Defendants reserve right to object to any specific materials contained herein
P126	Index of Docs	801, 802
P127	Plaintiffs' Initial Expert Disclosure	401, 402, 403, 801, 802
P128	Invoices	401, 402, 403, 801, 802
P129	BIN3 49 Exemplar Restraint Data: 1999(+) Toyota 4Runner	401, 402, 403, 801, 802
P130	Diagram	401, 402, 403, 801, 802
P131	Figure 2 - Retractor Unlocked Rotation Ranges	401, 402, 403, 801, 802
P132	SAFE Depo Notebook	401, 402, 403, 801, 802
P133	SAFE Photographs	401, 402, 403, 801, 802
	EXHIBITS TO THE DEPO OF POWER, ROBERT, CHIEF DEPUTY (SMITH v. TOYOTA; 2016 02 06)	
	NO EXHIBITS MARKED	
	EXHIBITS TO THE DEPO OF REICHERT, CRAIG (SMITH v. TOYOTA; 2015 11 16)	
P134	Missouri Uniform Crash Report (redacted in accordance with MIL ruling)	
	EXHIBITS TO THE DEPO OF SCHNEIDER, DENNIS (SMITH v. TOYOTA; 2018 01 04)	
P135	CV	
P136	Depo and Trial Testimony list	
P137	Correspondence clip	401, 402, 403, 801, 802
P138	Missouri Uniform Crash Report (redacted in accordance with MIL ruling)	
P139	Western Lewis county FPD Crash Report	
P140	Affidavit of Kile Austin	403, 801, 802
P141	Affidavit of Michael Whiteaker	403, 801, 802

P142	TextMap Annotation Digest Report - Kristin Smith	403, 801, 802
P143	TextMap Annotation Digest Report - Lloyd Smith	403, 801, 802
P144	TextMap Annotation Digest Report - Craig Reichert	403, 801, 802
P145	TextMap Annotation Digest Report - Deputy Chief Robert Power	403, 801, 802
P146	Table of contents	
P147	Medical Records Reviewed	
P148	AIS coding of injuries	403, 801, 802, 1002
P149	Short File Chronology of Injuries and Events	403, 801, 802, 1002
P150	Illustrations of General Anatomic Injury Location and Feature	
P151	Illustrations of General Anatomic Injury Location and Feature	
P152	Illustrations of General Anatomic Injury Location and Feature	
P153	Illustrations of General Anatomic Injury Location and Feature	
P154	Illustrations of Muscles of Rotator Cuff	
P155	Illustrations of Lateral View of Pectoral Girdle	
P156	Illustrations of Muscles of Hip and Thigh: Lateral View	
P157	Illustrations of Skull: Anterior View	
P158	Illustrations of Bones of Trunk and Pelvis	
P159	Illustrations of the Humerus of the Right Arm and Detailed Views of the Articulation at the Elbow	
P160	Accident Reconstructions Diagram Prepared by Carr Engineering	
P161	Series of Photographs	
P162	PowerPoint Index of Injuries	
P163	Series of Slides from a PowerPoint Presentation	
P164	Medical Records Reviewed	
P165	AIS coding of injuries	403, 801, 802, 1002
P166	Illustrations of General Anatomic Injury Locations and Feature	
P167	Lewis County Ambulance DI	
P168	Transport Medical Record	
P169	Medical Records: Trauma - Multisystem	
P170	Medical Record: Blessing Hospital	
P171	Emergency Center Trauma Flowsheet	
P172	Trauma Flowsheet Narrative Notes	
P173	Medical Record: Blessing Hospital (assumed Schneider Ex. 39) ¹	
P174	Emergency Center Record: Blessing Hospital (Schneider Ex. 40)	602, 702, 801, 802
P175	Medical Record: Blessing Hospital (Schneider Ex. 41)	602, 702, 801, 802
P176	Medical Record: Blessing Hospital (Schneider Ex. 42)	602, 702, 801, 802
P177	Medical Record: Blessing Hospital (Schneider Ex. 43)	602, 702, 801, 802

¹Plaintiffs' exhibits P173 to P233 are all vaguely titled as medical records from Blessing Hospital. Assuming Plaintiffs intended to continue numerically referencing the exhibits from Dr. Schneider's deposition, Defendants have herein lodged objections as if exhibits P173 to P233 are copies of Schneider Depo Exhibits 39 to 99.

P178	Medical Record: Blessing Hospital (Schneider Ex. 44)	602, 702, 801, 802
P179	Medical Record: Blessing Hospital (Schneider Ex. 45)	602, 702, 801, 802
P180	Medical Record: Blessing Hospital (Schneider Ex. 46)	602, 702, 801, 802
P181	Medical Record: Blessing Hospital (Schneider Ex. 47)	602, 702, 801, 802
P182	Medical Record: Blessing Hospital (Schneider Ex. 48)	602, 702, 801, 802
P183	Medical Record: Blessing Hospital (Schneider Ex. 49)	602, 702, 801, 802
P184	Medical Record: Blessing Hospital (Schneider Ex. 50)	602, 702, 801, 802
P185	Medical Record: Blessing Hospital (Schneider Ex. 51)	602, 702, 801, 802
P186	Medical Record: Blessing Hospital (Schneider Ex. 52)	602, 702, 801, 802
P187	Medical Record: Blessing Hospital (Schneider Ex. 53)	602, 702, 801, 802
P188	Medical Record: Blessing Hospital (Schneider Ex. 54)	602, 702, 801, 802
P189	Medical Record: Blessing Hospital (Schneider Ex. 55)	602, 702, 801, 802
P190	Medical Record: Blessing Hospital (Schneider Ex. 56)	602, 702, 801, 802
P191	Medical Record: Blessing Hospital (Schneider Ex. 57)	602, 702, 801, 802
P192	Medical Record: Blessing Hospital (Schneider Ex. 58)	602, 702, 801, 802
P193	Medical Record: Blessing Hospital (Schneider Ex. 59)	602, 702, 801, 802
P194	Medical Record: Blessing Hospital (Schneider Ex. 60)	602, 702, 801, 802
P195	Medical Record: Blessing Hospital (Schneider Ex. 61)	602, 702, 801, 802
P196	Medical Record: Blessing Hospital (Schneider Ex. 62)	602, 702, 801, 802
P197	Medical Record: Blessing Hospital (Schneider Ex. 63)	602, 702, 801, 802
P198	Medical Record: Blessing Hospital (Schneider Ex. 64)	602, 702, 801, 802
P199	Medical Record: Blessing Hospital (Schneider Ex. 65)	602, 702, 801, 802
P200	Medical Record: Blessing Hospital (Schneider Ex. 66)	602, 702, 801, 802
P201	Medical Record: Blessing Hospital (Schneider Ex. 67)	602, 702, 801, 802
P202	Medical Record: Blessing Hospital (Schneider Ex. 68)	602, 702, 801, 802
P203	Medical Record: Blessing Hospital (Schneider Ex. 69)	602, 702, 801, 802
P204	Medical Record: Blessing Hospital (Schneider Ex. 70)	602, 702, 801, 802
P205	Medical Record: Blessing Hospital (Schneider Ex. 71)	602, 702, 801, 802
P206	Medical Record: Blessing Hospital (Schneider Ex. 72)	602, 702, 801, 802
P207	Medical Record: Blessing Hospital (Schneider Ex. 73)	602, 702, 801, 802
P208	Medical Record: Blessing Hospital (Schneider Ex. 74)	602, 702, 801, 802
P209	Medical Record: Blessing Hospital (Schneider Ex. 75)	602, 702, 801, 802
P210	Medical Record: Blessing Hospital (Schneider Ex. 76)	602, 702, 801, 802
P211	Medical Record: Blessing Hospital (Schneider Ex. 77)	602, 702, 801, 802
P212	Medical Record: Blessing Hospital (Schneider Ex. 78)	602, 702, 801, 802
P213	Medical Record: Blessing Hospital (Schneider Ex. 79)	602, 702, 801, 802
P214	Medical Record: Blessing Hospital (Schneider Ex. 80)	602, 702, 801, 802
P215	Medical Record: Blessing Hospital (Schneider Ex. 81)	602, 702, 801, 802
P216	Medical Record: Blessing Hospital (Schneider Ex. 82)	602, 702, 801, 802

P217	Medical Record: Blessing Hospital (Schneider Ex. 83)	602, 702, 801, 802
P218	Medical Record: Blessing Hospital (Schneider Ex. 84)	602, 702, 801, 802
P219	Medical Record: Blessing Hospital (Schneider Ex. 85)	602, 702, 801, 802
P220	Medical Record: Blessing Hospital (Schneider Ex. 86)	602, 702, 801, 802
P221	Medical Record: Blessing Hospital (Schneider Ex. 87)	602, 702, 801, 802
P222	Medical Record: Blessing Hospital (Schneider Ex. 88)	602, 702, 801, 802
P223	Medical Record: Blessing Hospital [sic – should be Dr. Childress Office Visit December 20, 2012] (Schneider Ex. 89)	401, 402, 403, 602, 702, 801, 802
P224	Medical Record: Blessing Hospital [sic – should be Dr. Childress Progress Note April 14, 2008] (Schneider Ex. 90)	401, 402, 403,
P225	Medical Record: Blessing Hospital [sic – should be March 16, 2010 Office Encounter at LaBelle] (Schneider Ex. 91)	401, 402, 403, 602, 801, 802
P226	Medical Record: Blessing Hospital [sic – should be June 9, 2011 Office Encounter at Lewistown] (Schneider Ex. 92)	401, 402, 403
P227	Medical Record: Blessing Hospital [sic – should be July 5, 2011 Office Encounter at Lewistown] (Schneider Ex. 93)	401, 402, 403
P228	Medical Record: Blessing Hospital [sic – should be July 5, 2011 Radiology Report Quincy Medical Group] (Schneider Ex. 94)	401, 402, 403
P229	Medical Record: Blessing Hospital [sic – should be December 19, 2011 Office Encounter at Lewistown] (Schneider Ex. 95)	602, 702, 801, 802
P230	Medical Record: Blessing Hospital [sic – should be December 29, 2012 Radiology Report Quincy Medical Group] (Schneider Ex. 96)	401, 402, 403
P231	Medical Record: Blessing Hospital [sic – should be July 31, 2012 Office Encounter at LaBelle] (Schneider Ex. 97)	401, 402, 403, 602, 801, 802
P232	Medical Record: Blessing Hospital [sic – should be flash drive of Dr. Schneider's file materials] (Schneider Ex. 98)	Unable to correlate specific objections with exhibits due to bulk identification; Defendants reserve right to object to any specific materials contained herein
P233	Medical Record: Blessing Hospital [sic – should be vehicle photos in junkyard] (Schneider Ex. 99)	
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P234	Background of Mr. Motoki Shibata	
P235	Drawings - 1997 Retractor & Buckle Power Seat	

P236	<p>Drawings - 96092 Retractor & Buckle Non-Power Seat (11 drawings):</p> <ol style="list-style-type: none"> 1. Installation Drawing Seat Belt Assy 2. Belt Assy Front Seat Outer LH 3. Belt Assy Fr Seat Outer LH 4. Belt Assy Fr Seat Outer LH 5. Belt Assy Fr Seat Outer LH 6. Belt Assy Fr Seat Outer LH 7. Belt Assy Fr Seat Inner 8. Belt Assy Fr Seat Inner 9. Retractor Assy Fr Seat Belt LH 10. Retractor Assy Fr Seat Belt RH/LH 11. Retractor Assy, Fr Seat Belt RH/LH 	
P237	<p>1997 Test Reports (6):</p> <ol style="list-style-type: none"> 1. Automotive Seat Belt Assy, Type 2, submitted and identified by Client for specific testing (17 pg) 2. Addendum to US Testing Company, Inc., Report No 115426-95; Change of Webbing Guide (4 pg) 3. FMVSS 209, Seat Belt Assy (In Japanese) (10 pg) 4. Japanese document (11 pg) 5. Summary of test results, other than regulations, for seat belt (11 pg) 6. Test Method for Vehicle RO (Japanese and English) (27 pg) 	
P238	1996, 1998-2002 Test Reports	
P239	Folder - FMVSS 208 (Fitting) - Test Report no. RRMS-957009 1996-2002 Seat Belt Fitting Test on 185T (US and Canada Bound, Sport Type Seat)	
P240	Folder - FMVSS 209, Test Report No. RRBH-958007 1996-1997, FMVSS Compliance Test on Front Seat Belt of 185T	
P241	Folder - Head On - Test Report No. RRMS-951014 1996-1997, 052W (U.S. Bound) 35 MPH, Head-On Collision Test (JH15059)	
P242	Right Oblique - Test Report No. RRMS-95109 1996-2000, 30 MPH Right Oblique Collision Test on 185T (JH5025) (FMVSS 301)	
P243	Left Oblique - Test Report No. RRMS-951022 1996-2000, 30 MPH Left Oblique Collision Test on 185T (US Bound) (JH4039) (FMVSS 301)	
P244	RIGHT SIDE - TEST REPORT NO. RRMS-952006 1996-2002, 20MPH RIGHT SIDE COLLISION TEST ON 185T (U.S. BOUND, 4X4, 853E ENGINE) (JM5003) (FMVSS 301) AND COLOR PHOTOGRAPHS	
P245	LEFT SIDE - TEST REPORT NO. RRMS-952005 1996-2002, 20MPH LEFT SIDE COLLISION TEST ON 185T (U.S. BOUND, 4X4, 853E ENGINE) (JM5002) (FMVSS 301) AND COLOR PHOTOGRAPHS	
P246	REAR END - TEST REPORT NO. RRMS-952001 1996-2000, 35MPH REAR END COLLISION TEST ON 185T (U.S. BOUND, 4X4 848E ENGINE) (JM4008) (FMVSS 301) AND COLOR PHOTOGRAPHS	
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P248	TEST REPORT NO. RRMS-952004 1996-2002, 30 MPH DOLLY ROLLOVER TEST ON 185T (U.S. BOUND 4X4 835E ENGINE) (XY4017) AND COLOR PHOTOGRAPHS	
P249	TEST REPORTS AND DRAWINGS RELATED TO 1996-2002 MODEL 4RUNNER ROOF	
P250	"TOYOTA AND AUTOMOTIVE SAFETY" (CQQ-0436 TO 0456)	401, 402, 403, 901, 1002
P251	1997 OWNER'S MANUAL - 4RUNNER (109666 TO 109908)	
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P253	Aerial photo of scene	
P254	Scene Photograph	
P255	Scene Photograph	
P256	Scene Photograph	
P257	Missouri Uniform Crash Report (redacted in accordance with MIL ruling)	
	EXHIBITS TO THE DEPO OF SMITH, LLOYD (SMITH v. TOYOTA; 2015 02 20)	
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P260	Scene photo	
P261	Scene photo	
P262	Scene photo	
P263	Scene photo	
P264	Scene photo	
P265	Scene photo	
P266	Scene photo	
P267	Scene photo	
P268	Vehicle photo	
P269	Vehicle photo	
P270	Vehicle photo	
P271	Vehicle photo	
P272	Vehicle photo	
P273	Vehicle photo	
P274	Vehicle photo	
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P277	Vehicle photo	
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P280	Vehicle photo	
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P282	Vehicle photo	
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P284	Vehicle photo	
	EXHIBITS TO THE DEPO OF VAN ARSDELL, WILLIAM (SMITH v. TOYOTA; 2017 12 22)	
P285	Hard drive: Court Documents Expert Depos Expert Reports/Disclosures Fact Depos and Exhibits First Responder Reports Material Subject to PO Medical Records Miscellaneous Photographs and Video Van Arsdell Material: CV/Testimony List Depo Summaries EP Correspondence Literature Testing EP Facts Summary Experts - NOD for TMC Experts File Materials listing RO (Quarter Turns) NOD - Van Arsdell	Unable to correlate specific objections with exhibits due to bulk identification; Defendants reserve right to object to any specific materials contained herein
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P287	List of Materials	401, 402, 403
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P298	Exemplar Retractor	
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P300	Cell phone records	
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	EXHIBITS TO THE DEPO OF WHITEAKER, MICHAEL (SMITH v. TOYOTA; 2015 11 17)	
P302	Western Lewis County Fire Dept. Report, Incident 2012-48	
P303	Affidavit of Michael Whiteaker	403, 801, 802
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P305	Western Lewis County Fire Dept. Report	
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P307	Lewis County Sheriff's Office Incident Report	
P308	Accident Overview from Lloyd Smith	401, 402, 403
P309	Accident Site Photos taken by Lloyd Smith	
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P311	Flash Drive from North Star Imaging enclosing Buckle Photos	401, 402, 403, 801, 802, 901, Fed. R. Civ. Pro. 26(a) lack of disclosure
P312	Petition for Damages	401, 402, 403
P313	Complaint	401, 402, 403
P314	4-Runner Insurance Policy	401, 402, 403, 801, 802, 901, Fed. R. Civ. Pro. 26(a) lack of disclosure
P315	Motorhome Insurance Policy	401, 402, 403, 801, 802, 901, Fed. R. Civ. Pro. 26(a) lack of disclosure
P316	Shelter Insurance File re Medical Bills	401, 402, 403, 801, 802, 901
P317	Vehicle Information - Recalls	401, 402, 403, 801, 802, 901, Fed. R. Civ. Pro. 26(a) lack of disclosure
P318	Certificate of Title	
P319	Carfax Report	
P320	Chain of Title History	403, 602, 801, 802, 901
P321	Missouri Dept. of Revenue - DMV Recs	403, 801, 802, 901
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P330	Affidavit of Custodian of Billing Records of Air Evac EMS, Inc., Debra Martinez	401, 402, 403, 602, 702, 801, 802
P331	Lewis County Ambulance	401, 402, 403, 602, 702, 801, 802, 901
P332	Blessing Hospital	401, 402, 403, 602, 702, 801, 802, 901
P333	Blessing Physician Services	401, 402, 403, 602, 702, 801, 802, 901
P334	Affidavit of Custodian of Billing Records of Blessing Hospital, Mary Lou Miller	401, 402, 403, 602, 702, 801, 802
P335	Clinical Radiologists	401, 402, 403, 602, 702, 801, 802, 901
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	Sri Kumar:	
P339	Correspondence	401, 402, 403, 801, 802, 901
	Mark Arndt:	
P340	Correspondence	401, 402, 403, 801, 802, 901
P341	Affidavit of Mark Arndt	403, 602, 702, 801, 802
	Steve Meyer:	
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	TAB'S MISCCELLANEOUS EXHIBITS:	
P343	All medical records produced in discovery	401, 402, 403, 602, 702, 801, 802, 901
P344	All medical bills produced in discovery	401, 402, 403, 602, 702, 801, 802, 901
P345	All Toyota records produced in discovery	Unable to correlate specific objections with exhibits due to bulk identification; Defendants reserve right to object to any specific materials contained herein
P346	All vehicle ownership and maintenance records	Unable to correlate specific objections with exhibits due to bulk identification; Defendants reserve right to object to any specific materials contained herein
P347	All documents produced by Toyota	Unable to correlate specific objections with exhibits due to bulk identification; Defendants reserve right to object to any specific materials contained herein
P348	Demonstrative aids from previously listed deposition exhibits	Unable to correlate specific objections with exhibits due to bulk identification; Defendants reserve right to object to any specific materials contained herein
P349	Demonstrative aids	Unable to correlate specific objections with exhibits due to bulk identification; Defendants reserve right to object to any specific materials contained herein
P350	The accident vehicle	Plaintiffs have indicated this entry was erroneous as the subject vehicle was demolished

P351	Vehicle components	Plaintiffs have indicated this entry was erroneous as the subject vehicle was demolished
P352	Exemplar components	Unable to correlate specific objections with exhibits due to bulk identification; Defendants reserve right to object to any specific materials contained herein
P353	Exemplar photos and diagrams	Unable to correlate specific objections with exhibits due to bulk identification; Defendants reserve right to object to any specific materials contained herein
P354	PowerPoint presentations by experts for identification	Unable to correlate specific objections with exhibits due to bulk identification; Defendants reserve right to object to any specific materials contained herein

Respectfully submitted,

/s/ DAVID P. STONE

KURT C. KERN (Admitted Pro Hac Vice)

kurt.kern@bowmanandbrooke.com

DAVID P. STONE (Admitted Pro Hac Vice)

david.stone@bowmanandbrooke.com

CRAIG DUPEN (Admitted Pro Hac Vice)

craig.dupen@bowmanandbrooke.com

BOWMAN AND BROOKE LLP

5830 Granite Parkway, Suite 1000

Plano, Texas 75024

(972) 616-1700

(972) 616-1701 (fax)

AND

STEPHEN M. STRUM, #37133
SANDBERG PHOENIX & von GONTARD P.C.
600 Washington Avenue
15th Floor
St. Louis, MO 63101
314-446-4282
314-241-7604 (fax)
sstrum@sandbergphoenix.com

ATTORNEYS FOR DEFENDANTS
TOYOTA MOTOR CORPORATION AND
TOYOTA MOTOR SALES, U.S.A., INC.

CERTIFICATE OF SERVICE

The undersigned certifies that a copy of the foregoing was electronically served on all counsel of record via the Court's ECF system, this 9th day of April, 2018, to the following counsel of record:

C. Tab Turner
Turner & Associates, P.A.
4705 Somers Avenue
North Little Rock, AR 72116

and

Douglas P. Dowd
Dowd & Dowd, P.C.
211 N. Broadway, 40th Floor
St. Louis, MO 63102
Attorneys for Plaintiffs

/s/ DAVID P. STONE